

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

RON WASHINGTON,)	
)	
Plaintiff,)	
)	Case No. 3:19-cv-00154
v.)	Judge William L. Campbell, Jr.
)	
EQUIFAX,)	
)	
Defendant.)	

**DEFENDANT EQUIFAX INFORMATION SERVICES LLC’S
MOTION TO DISMISS**

Defendant Equifax Information Services LLC (“EIS”), incorrectly identified in the Complaint as “Equifax,” hereby moves the Court to dismiss the Complaint filed by Plaintiff Ron Washington (“Plaintiff”) for failure to state a claim upon which relief can be granted pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

As set forth in more detail in the accompanying Memorandum of Law, Plaintiff fails to state a claim upon which relief can be granted under either of the two statutory provisions of the Fair Credit Reporting Act (“FCRA”) that he identifies in his Complaint. Plaintiff’s claim under section 611(a)(7) of the FCRA, 15 U.S.C. § 1681i(a)(7), fails because he does not plead an inaccuracy. Plaintiff’s claim under section 609 of the FCRA, 15 U.S.C. § 1681g, fails because including a truncated account number in a credit file disclosure is not a violation of the FCRA.

Accordingly, EIS respectfully requests that the Court grant its motion, dismiss EIS from this case, and grant all other relief as the Court deems appropriate.

Respectfully submitted this 21st day of February, 2019.

EQUIFAX INFORMATION SERVICES LLC

/s/Katy C. Laster

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of February 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and a true and accurate copy was sent via U.S. Mail to:

Ron Washington
1492 Mutual Dr.
Clarksville, TN 37042

By: /s/Katy C. Laster
Katy C. Laster